

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

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IN RE:	:	
	:	Chapter 13
BERNADETTE C RAINES,	:	
	:	Case No. 23-11627-PMM
Debtor.	:	

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**DEBTOR’S RESPONSE TO MOTION FOR RELIEF FROM STAY**

BERNADETTE C RAINES (the “Debtor”), by and through their undersigned counsel, hereby submits this Response to the Motion of Diane G. Morris (the “Movant”) for Relief from the Automatic Stay (the “Motion”), and in support thereof respectfully states the following:

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Denied.
6. Denied.
7. Denied.
8. Denied.
9. Denied.
10. Denied.
11. Denied.
12. Denied.
13. Denied. By way of further response, the Debtor has filed a plan in good faith pursuant to 11 U.S.C. § 1325(a)(3) and is confirmable pursuant to 11 U.S.C. §§ 1325(a)(4) and 1325(a)(5).

14. Denied.

15. Denied.

16. Denied.

17. Denied. It is specifically denied that either (a) cause exists warranting relief from the automatic stay; or (b) the Movant lacks adequate protection warranting relief from the automatic stay under 11 U.S.C. § 362(d).

18. Denied. It is specifically denied that the relief sought in the Motion will not hinder the Respondent's effective reorganization. By way of further response, relief from the automatic stay will directly and substantially impact the Debtor's ability to effectively reorganize.

Respectfully submitted,

Dated: October 20, 2023

/s/ Brad J. Sadek

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